

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

UNITED STATES OF AMERICA	:	CRIMINAL NO. 19-
v.	:	DATE FILED:
MATTHEW BENJAMIN LAVER	:	VIOLATIONS:
	:	18 U.S.C. § 2252(a)(2)
	:	(distribution and attempted distribution
	:	of child pornography – 1 count)
	:	18 U.S.C. § 2252(a)(2) (receipt and
	:	attempted receipt of child pornography –
	:	2 counts)
	:	18 U.S.C. § 2252(a)(4)(B) (possession of
	:	child pornography – 1 count)
		Notice of forfeiture

INDICTMENT

COUNT ONE

THE GRAND JURY CHARGES THAT:

From on or about July 30, 2018 to on or about July 31, 2018, in Souderton, in the Eastern District of Pennsylvania, defendant

MATTHEW BENJAMIN LAVER

knowingly distributed, and attempted to distribute, visual depictions using any means and facility of interstate and foreign commerce, and that had been mailed and shipped and transported in and affecting interstate and foreign commerce by any means, including by computer, and which contained materials that had been mailed and shipped and transported in and affecting interstate and foreign commerce by any means, including by computer, the producing of which involved the use of minors engaging in sexually explicit conduct, and the visual depictions were of such

conduct.

In violation of Title 18, United States Code, Sections 2252(a)(2), (b)(1).

COUNT TWO

THE GRAND JURY FURTHER CHARGES THAT:

On or about July 31, 2018, in Souderton, in the Eastern District of Pennsylvania,
defendant

MATTHEW BENJAMIN LAVER

knowingly received, and attempted to receive, visual depictions using any means and facility of interstate and foreign commerce, and that had been mailed and shipped and transported in and affecting interstate and foreign commerce by any means, including by computer, and which contained materials that had been mailed and shipped and transported in and affecting interstate and foreign commerce by any means, including by computer, the producing of which involved the use of minors engaging in sexually explicit conduct, and the visual depictions were of such conduct.

In violation of Title 18, United States Code, Sections 2252(a)(2), (b)(1).

COUNT THREE

THE GRAND JURY FURTHER CHARGES THAT:

On or about August 2, 2018, in Souderton, in the Eastern District of Pennsylvania,
defendant

MATTHEW BENJAMIN LAVER

knowingly received, and attempted to receive, a visual depiction using any means and facility of interstate and foreign commerce, and that had been mailed and shipped and transported in and affecting interstate and foreign commerce by any means, including by computer, and which contained materials that had been mailed and shipped and transported in and affecting interstate and foreign commerce by any means, including by computer, the producing of which involved the use of a minor engaging in sexually explicit conduct, and the visual depiction was of such conduct.

In violation of Title 18, United States Code, Sections 2252(a)(2), (b)(1).

COUNT FOUR

THE GRAND JURY FURTHER CHARGES THAT:

On or about October 25, 2018, in Souderton, Pennsylvania, in the Eastern District of Pennsylvania, defendant

MATTHEW BENJAMIN LAVER

knowingly possessed matter, that is, one Dell XPS model 1710 laptop computer bearing serial number HPWYHC1, two cases with numerous DVDs, four CD-ROMs, and one Apple iPhone bearing serial number C6KTL582HG6X, all of which contained visual depictions that had been mailed and shipped and transported using any means and facility of in interstate and foreign commerce and in and affecting interstate and foreign commerce, and that were produced using materials that had been mailed and shipped and transported in interstate and foreign commerce. The production of these visual depictions involved the use of minors engaging in sexually explicit conduct and the visual depictions were of such conduct. The minors depicted included prepubescent minors and minors who had not attained 12 years of age.

In violation of Title 18, United States Code, Sections 2252(a)(4)(B), (b)(2).

NOTICE OF FORFEITURE

THE GRAND JURY FURTHER CHARGES THAT:

As a result of the violations of Title 18, United States Code, Sections 2252(a)(2) and (a)(4)(B), as set forth in this indictment, defendant

MATTHEW BENJAMIN LAVER

shall forfeit to the United States of America:

(a) any visual depiction described in Section 2252, or any film, videotape, or other matter which contains any such visual depiction, which was produced, transported, mailed, shipped, or received as a result of such violation;

(b) any property, real or personal, constituting or traceable to gross profits or other proceeds obtained from such violation; and

(c) any property used or intended to be used, in any manner or part, to commit, or to facilitate the commission of, the violations of Title 18, United States Code, Sections 2252(a)(2) and (a)(4)(B), including, but not limited to:

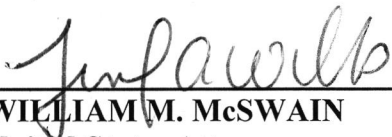
1. Dell XPS model 1710 laptop computer bearing serial number HPWYHC1;
2. Two cases with numerous DVDs containing contraband;
3. Four individual CD-ROMs containing contraband;
4. Apple iPhone bearing serial number C6KTL582HG6X;
5. Apple iPad model A1567 bearing serial number DLXQ33CZG5WQ;
6. Western Digital external hard drive bearing serial number WX31E92RN254; and

7. Maxtor 320GB external hard drive bearing serial number 2HAPV996.

All pursuant to Title 18, United States Code, Sections 2253 and 2428.

A TRUE BILL:

GRAND JURY FOREPERSON

for 
WILLIAM M. McSWAIN
United States Attorney